

## FDD-PST

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**From:** Donna Gibson [dgibson@mcsd.ga.net]  
**Sent:** Tuesday, April 25, 2000 9:45 AM  
**To:** fdd-pst@fns.usda.gov; ahopgood@doe.k12.ga.us; efreeman@doe.k12.ga.us; lelliott@marietta-city.k12.ga.us; nrice@spalding.k12.ga.us  
**Subject:** Comments on proposed commodity program changes

April 25, 2000

Director  
Food Distribution Division  
Food and Nutrition Service  
3101 Park Center Drive  
Alexandria, VA 22302

Dear Sir:

The following comments are to address USDA's proposed changes in Food Distribution 2000: Transforming Food Distribution for the Next Millennium.

### Section I: Problems in the Commodity Program

Many of the items listed are particular problems in particular states, not generally throughout the nation. For example, the Georgia Department of Education has worked tirelessly to resolve the problems listed there. If however these items are still problems in other states, then the R/Os should utilize their considerable influence to resolve those issues and to hold the individual states accountable.

Three issues, which are still problems, relate to recalls and should be addressed by USDA. Over the past few years, RAs have had to provide costly storage for products that are on hold for long periods of time. USDA should have the authority to immediately pick-up and store the products commercially and replace the value in cash.

### Section II: Improvements to the Commodity Program

1. I agree with the expansion of long-term contract.
3. I am opposed to using the lower industry standards as our specifications, but I agree that product specifications should be updated. Knowledgeable school nutrition professionals should dominate any panel involved in determining the specs, not industry. Commercial available products are frequently of a much lower nutritional value than USDA products.
4. I am adamantly opposed to the use of commercial labels. It is difficult for local school personnel to separate and maintain USDA inventories as required for audit. There are no advantages to commercial labeling since the customers do not see the label, only the end product.
5. I thought we used to have a national umbrella processing contract; what happened to it? Why not just reinstate the practice.
6. I am adamantly opposed to full substitutability of commodity product. We want to be sure that we get American beef and other domestic USDA specified products. In addition, we want to be sure that our products are fully USDA graded.
7. How would we be able to monitor that we get our full USDA entitlement? Who is going to monitor that we are provided the correct product when a commercial vendor has numerous products in his warehouse produced by the same company? There would be increased costs associated with slotting fees and marketing that would drive up end-costs.
8. This would be an improvement if we could get things like trail mix and calcium fortified orange juice this would be packaged in portion control packs to meet component requirements for snack.
9. Agree.
10. Agree.
11. Agree.
12. I foresee that this proposal completely bypasses the state department, local SFA and goes directly to the school level, and I am opposed to this. System level directors are charged with administration of the entire program for the entire school district. This proposal would result in chaos.

13. This would be good for processors but not for states.
14. The proposed time-line is unrealistic. How will pilots be chosen - RFP? Will there be control systems?
15. I agree that truck drops should be increased from 2 to 3 or 4.
16. I completely agree.

Thank you for allowing me to comment on these proposals.

Sincerely,  
Donna O. Gibson, MS, RD, LD  
School Nutrition Specialist

cc: Annette Bomar Hopgood  
Elaine Freeman  
Nancy Dye Rice  
Lana Elliot Jackson